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STATE OF NEW JERSEY
DIVISION OF GAMING ENFORCEMENT
DOCKET NO. 12-0743-VC

STATE OF NEW JERSEY, DEPARTMENT)	
OF LAW AND PUBLIC SAFETY,)	
DIVISION OF GAMING ENFORCEMENT,)	
)	
Complainant,)	Civil Action
)	
v.)	COMPLAINT
)	
BALLYS PARK PLACE, INC. d/b/a)	
BALLYS ATLANTIC CITY HOTEL & CASINO,)	
)	
Respondent.)	
)	

Complainant, State of New Jersey, Department of Law and Public Safety,
Division of Gaming Enforcement ("Division"), located at 1300 Atlantic Avenue, Atlantic
City, New Jersey, 08401 says:

1. Respondent, BALLY'S PARK PLACE, INC d/b/a BALLY'S ATLANTIC CITY HOTEL & CASINO ("Bally's") is a New Jersey corporation having its principal place of business at Park Place and the Boardwalk, Atlantic City, New Jersey 08401.

2. Bally's is the holder of a casino license first issued on or about December 29, 1980 and most recently renewed effective June 30, 2008. At all times relevant herein, Bally's was authorized to conduct casino gaming within its casino hotel facility.

3. N.J.A.C. 13:69D-1.21(a) provides, in pertinent part, that:

Whenever the table inventory is required to be counted pursuant to this subsection, a Table Inventory Slip shall be prepared. Table Inventory Slips shall be two part forms, at a minimum, and on the original of the slip ("Closer") and the duplicate of the slip ("Opener"), the casino supervisor shall record the following:

1. The date and identification of the shift ended;
2. The game and table number;
3. The total value of each denomination of gaming chips, coins and/or plaques remaining at the gaming table; and
4. The total value of all denominations of gaming chips, coins and/or plaques remaining at the gaming table.

4. N.J.A.C. 13:69D-1.21(c) provides, in pertinent part, that:

The dealer or boxperson assigned to the gaming table shall count the contents of the table inventory in the presence of the casino supervisor assigned to such table and shall agree the count to the Opener.

5. N.J.A.C. 13:69D-1.21(d) provides, in pertinent part, that:.

The dealer or boxperson who counted the table inventory and the casino supervisor who observed the count shall sign the Opener attesting to the accuracy of the information recorded on the Opener.

6. On July 18, 2012, at approximately 5:00 a.m., Bally's personnel closed Roulette table RO-210 and prepared a Table Inventory Slip ("TIS") as required by N.J.A.C. 13:69D-1.21(a). The original TIS, i.e. the "closer", inaccurately recorded the value of the inventory of orange (\$1,000) chips to be \$20,000 when, in fact, the actual value of the inventory of orange chips was \$40,000.

7. Subsequent to the events described in Paragraph 6, above, at approximately 11:45 a.m. on July 18, 2012, Roulette table RO-210 was opened to the public for gaming. As required by N.J.A.C. 13:69D-1.21(a), Bally's games personnel prepared the duplicate TIS, i.e. the "opener", but inaccurately recorded the value of the inventory of orange chips to be \$20,000 when, in fact, the actual value of the inventory of orange chips was \$40,000.

8. All personnel responsible for the preparation of the Closer and the Opener as described in Paragraphs 6 and 7, above, signed the documents attesting to the accuracy of the documents when, in fact, the documents were inaccurate.

9. At approximately 2:00 p.m. on July 18, 2012, and subsequent to a shift change, Bally's games personnel assigned to the gaming table detected a discrepancy and notified the appropriate individuals.

10. On July 8, 2010, October 7, 2009, May 6, 2009, October 23, 2008 and October 11, 2008, the Division issued warning letters to Bally's for identical incidents of non-compliance, specifically, inaccuracies in the preparation of Table Inventory Slips.

11. Based upon the conduct described in Paragraphs 1 through 9, above, on July 18, 2012, Bally's, by its games personnel failed to accurately prepare Table Inventory Slips for Roulette table RO-210, in violation of N.J.A.C. 13:69D-1.21(a).

12. Based upon the conduct described in Paragraphs 1 through 9, above, on July 18, 2012, Bally's games personnel signed Table Inventory Slips attesting to the accuracy of the documents when, in fact, the documents contained inaccurate information, in violation of N.J.A.C. 13:69D-1.21(d).

WHEREFORE, Complainant demands the following relief against Respondent, BALLY'S PARK PLACE, INC d/b/a BALLY'S ATLANTIC CITY HOTEL & CASINO:

A. Judgment that Bally's, by its games personnel failed to accurately prepare Table Inventory Slips for Roulette table RO-210, in violation of N.J.A.C. 13:69D-1.21(a);

B. Judgment that Bally's games personnel signed Table Inventory Slips attesting to the accuracy of the documents when, in fact, the documents contained inaccurate information, in violation of N.J.A.C. 13:69D-1.21(d).;

C. Judgment imposing an appropriate monetary penalty pursuant to N.J.S.A. 5:12-129(5) upon Bally's for said violations; and,

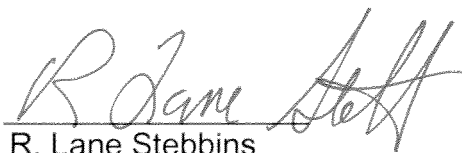
D. Judgment imposing such other relief as may be just and appropriate.

Respectfully submitted,

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Attorney General of New Jersey
Attorney for Complainant

By:



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Dated: 10/3/12

A-02-12-084